

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

D-1 RONNIE SMITH,
D-2 JORDAN JACKSON,
D-3 BRANDON KEEL,
D-4 JAYSON KEITH WILLIAMS,
D-5 KASHAWN JACKSON,
D-6 TAYQUAN MCWILLIAMS,
D-7 MAKAELE OURSO,

Defendants.

Case: 2:23-cr-20489
Judge: Friedman, Bernard A.
MJ: Patti, Anthony P.
Filed: 08-23-2023
IND USA V RONNIE SMITH ET AL (SS)

Violations:

18 U.S.C. § 371
18 U.S.C. § 2312

THE GRAND JURY CHARGES:

COUNT ONE

Conspiracy to Transport Stolen Vehicles
18 U.S.C. §§ 371, 2312

D-1 RONNIE SMITH,
D-2 JORDAN JACKSON,
D-3 BRANDON KEEL,
D-4 JAYSON KEITH WILLIAMS,
D-5 KASHAWN JACKSON,
D-6 TAYQUAN MCWILLIAMS,
D-7 MAKAELE OURSO,

From in or about March 2023 and continuing through in or about April 2023, in the Eastern District of Michigan and elsewhere, defendants RONNIE SMITH, JORDAN JACKSON, BRANDON KEEL, JAYSON KEITH WILLIAMS, KASHAWN JACKSON, TAYQUAN MCWILLIAMS, and MAKAELE OURSO knowingly combined, conspired, confederated, and agreed together and with others, both known and unknown to the Grand Jury, to transport stolen vehicles across state lines in violation of Title 18, United States Code, Section 2312.

Manner and Means of the Conspiracy

The object of the conspiracy was for the defendants and others, known and unknown to the Grand Jury, to steal motor vehicles from Pennsylvania, Virginia, Tennessee, West Virginia, and Indiana, and arrange for the sale and transportation of the stolen motor vehicles across state lines, knowing the motor vehicles had been stolen.

Overt Acts

In furtherance of the conspiracy and to affect the objects of the conspiracy, the defendants and others committed the following overt acts, among others, in the Eastern District of Michigan and elsewhere:

1. On or about March 25, 2023:

- a. Defendants RONNIE SMITH and JORDAN JACKSON traveled to the Pittsburgh International Airport in Pennsylvania.
- b. Co-conspirators RONNIE SMITH and JORDAN JACKSON transported a stolen 2018 black Jeep Grand Cherokee Trackhawk, VIN: 1C4RJFN94JC312806, from Pittsburgh, Pennsylvania to Toledo, Ohio.
- c. Co-conspirators driving a black Chevrolet Traverse registered to MAKAELO OURSO exited the tollbooth of the airport parking lot and the stolen Jeep piggybacks through that exit lane on the same transaction.
- d. Defendants RONNIE SMITH sent MAKAELO OURSO a Telegram message with a picture of this stolen vehicle at 9:47AM: 12 minutes after it was stolen.

2. On or about April 1, 2023, and April 2, 2023, Defendants RONNIE SMITH and MAKAELO OURSO communicated with each other about the stolen Jeep, which was located at

XXXX Macomber Street, Toledo, Ohio – the residence of
MAKAELA OURSO.

3. On or about March 31, 2023:
 - a. Co-conspirators RONNIE SMITH, JORDAN JACKSON, and BRANDON KEEL traveled to the lot of Ourisman Chrysler Jeep Dodge Ram in Woodbridge, Virginia and stole a 2020 red Jeep Grand Cherokee Trackhawk, VIN: 1C4RJFN92LC222931.
 - b. Co-conspirators RONNIE SMITH, JORDAN JACKSON, and BRANDON KEEL transported a stolen 2020 red Jeep Grand Cherokee Trackhawk, VIN: 1C4RJFN92LC222931, from Woodbridge, Virginia, through Pennsylvania and Ohio, and then to Eastpoint, Michigan.
 - c. Co-conspirators RONNIE SMITH, JORDAN JACKSON, and BRANDON KEEL traveled to the lot at Pittsburgh International Airport in Pennsylvania and stole a 2021 black Jeep Grand Cherokee Trackhawk, VIN: 1C4RJFN93MC809365.

- d. Co-conspirators RONNIE SMITH, JORDAN JACKSON, and BRANDON KEEL transported a stolen 2021 black Jeep Grand Cherokee Trackhawk, VIN: 1C4RJFN93MC809365, from Pittsburgh, Pennsylvania, to Toledo, Ohio.
4. On or about April 5, 2023:
- a. Defendants RONNIE SMITH, BRANDON KEEL, and KASHAWN JACKSON traveled to the lot at the Nashville Airport in Tennessee.
 - b. Co-conspirators RONNIE SMITH, BRANDON KEEL, and KASHAWN JACKSON traveled to the lot of Indianapolis International Airport in Indiana and stole a 2021 Black Dodge Durango, VIN: 1C4SDJGJ7MC826432.
 - c. Co-conspirators RONNIE SMITH, BRANDON KEEL, and KASHAWN JACKSON transported a stolen 2021 Black Dodge Durango, VIN: 1C4SDJGJ7MC826432, from Indianapolis, Indiana, to Hazel Park, Michigan.

5. On or about April 9, 2023:
 - a. Co-conspirators RONNIE SMITH, JORDAN JACKSON, and JAYSON KEITH WILLIAMS traveled to the lot at Morgantown Dodge Stellantis in Morgantown, West Virginia, and stole a 2020 Dodge Charger, VIN: 2C3CDXL90LH129638.
 - b. Co-conspirators RONNIE SMITH, JORDAN JACKSON, and JAYSON KEITH WILLIAMS transported a stolen 2020 Dodge Charger, VIN: 2C3CDXL90LH129638, from Morgantown, West Virginia to Eastpointe, Michigan.
6. On or about April 13, 2023:
 - a. Defendants RONNIE SMITH, JORDAN JACKSON, and TAYQUAN MCWILLIAMS traveled to a Stellantis Plant in Kokomo, Indiana.
 - b. Defendants RONNIE SMITH, JORDAN JACKSON, and TAYQUAN MCWILLIAMS had key fobs, burglary tools, and a ProPad device in their vehicle in Michigan.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

Transportation of Stolen Vehicles
18 U.S.C. §§ 2312, 2

D-1 RONNIE SMITH,
D-2 JORDAN JACKSON,
D-3 BRANDON KEEL

On or about March 31, 2023, in the Eastern District of Michigan and elsewhere, defendants RONNIE SMITH, JORDAN JACKSON, and BRANDON KEEL, aided and abetted by each other and others known and unknown to the Grand Jury, unlawfully transported and caused to be transported in interstate commerce a stolen vehicle, that is, a 2020 red Jeep Grand Cherokee Trackhawk, VIN: 1C4RJFN92LC222931, from the State of Virginia to the State of Michigan, knowing the same to be stolen, in violation of Title 18, United States Code, Sections 2312 and 2.

COUNT THREE

Transportation of Stolen Vehicles
18 U.S.C. §§ 2312, 2

D-1 RONNIE SMITH,
D-3 BRANDON KEEL,
D-5 KASHAWN JACKSON

On or about April 5, 2023, in the Eastern District of Michigan and elsewhere, defendants RONNIE SMITH, BRANDON KEEL, and

KASHAWN JACKSON, aided and abetted by each other and others known and unknown to the Grand Jury, unlawfully transported and caused to be transported in interstate commerce a stolen vehicle, that is, a 2021 Black Dodge Durango, VIN: 1C4SDJGJ7MC826432, from the State of Indiana to the State of Michigan, knowing the same to be stolen, in violation of Title 18, United States Code, Sections 2312 and 2.

COUNT FOUR

Transportation of Stolen Vehicles
18 U.S.C. §§ 2312 & 2

D-1 RONNIE SMITH,
D-2 JORDAN JACKSON,
D-4 JAYSON KEITH WILLIAMS

On or about April 9, 2023, in the Eastern District of Michigan and elsewhere, defendants RONNIE SMITH, JORDAN JACKSON, JAYSON KEITH WILLIAMS, aided and abetted by each other and others known and unknown to the Grand Jury, unlawfully transported and caused to be transported in interstate commerce a stolen vehicle, that is, a 2020 Blue Dodge Charger SRT Hellcat, VIN: 2C3CDXL90LH129638, from the State of West Virginia to the State of Michigan, knowing the same to be stolen, in violation of Title 18, United States Code, Sections 2312 and 2.

FORFEITURE ALLEGATIONS

The allegations contained in Counts One through Four of this Indictment are realleged and incorporated by reference to allege forfeiture under Title 18, United States Code, Section 981(a)(1)(C), Title 18, United States Code, Section 982(a)(5), and Title 28, United States Code, Section 2461(c).

Upon conviction of the offense in violation of Title 18, United States Code, Sections 2 and 2312, the defendants shall forfeit to the United States, under Title 18, United States Code, Section 982(a)(5), any property, real or personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, as a result of the offense.

Upon conviction of the conspiracy to violate Title 18, United States Code, Section 2312, in violation of Title 18, United States Code, Section 371, the defendants shall forfeit to the United States of America, under Title 18, United States Code, Section 981(a)(1)(C), and Title 18, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from gross proceeds traceable to the offense.

The forfeiture in this case may include entry of a forfeiture money judgment in an amount up to the value of the property subject to forfeiture for the violations of conviction.

If, by any act of omission of the defendant, the proceeds of the offenses: cannot be located upon the exercise of due diligence, have been transferred, sold to, or deposited with a third party, have been placed beyond the jurisdiction of the court, have been substantially diminished in value, or have been commingled with other property which cannot be divided without difficulty, the United States of America shall seek to forfeit substitute property under Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

This is a True Bill.

s/ Grand Jury Foreperson
Grand Jury Foreperson

DAWN N. ISON
United States Attorney

s/ Brandy R. McMillion
BRANDY R. McMILLION
Chief, General Crimes Unit
Assistant United States Attorney

s/ Jasmine Ayana Moore
JASMINE AYANA MOORE
Assistant United States Attorney

Dated: August 23, 2023

Case: 2:23-cr-20489
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United States District Court
 Eastern District of Michigan

Criminal Case Cover

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>Jalm</i>

Case Title: USA v. Ronnie Smith, et al.

County where offense occurred : Wayne and Macomb

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☐ Information --- no prior complaint.

☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 23-mj-30331]

☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

August 23, 2023

Date

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 Jasmine Ayana Moore
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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.